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State of California
Central Coast Water Board

January 16, 2019

Central Coast Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Dear Central Coast Water Quality Control Board,

We are drafting this letter to your organization in order to voice our concerns with the AG ORDER 4.0 CONCEPTUAL REGULATORY REQUIREMENT OPTIONS.

Overview

Vineyard Professional Services, Inc. has worked throughout the Central Coast for the last 20+ years providing vineyard management, wine business leadership and a range of consulting services to wineries, growers and investors. VPS currently manages over 2,000 acres in Monterey, Santa Barbara and San Luis Obispo Counties and has designed and developed over fifty properties in the last twenty years. In addition to vineyard development projects, VPS conducts due diligence requirements, constructs vineyard budgets and prepares vineyard financial forecasts. The professional and accredited team of farm managers provide winery estates with viticultural consulting on over 1,500 acres, spanning the Santa Rita Hills, Santa Maria, Westside Paso Robles, and Monterey areas. VPS uses sustainable and organic practices to most effectively grow vineyard assets for quality and client profitability.

Water Quality Related Practices

At VPS we assume the stewardship of the land we farm. This includes all resources including surface and groundwater. All of our properties are enrolled in the AG order and participate in required monitoring. We test irrigation suitability every two years to monitor the nitrogen, chloride, and salts.

Ground Water

About once a year and before adding any type of soil amendments such as compost we take soil samples and wait for analysis to be sure we are only adding the amount necessary to return soils to optimum levels of nutrition and structure. This is done so as not to create an excess nitrate level in the soil. During the growing season we take petiole samples at bloom and veraison in order to guide decisions on which macro and micro nutrients to apply so we are not baselessly applying fertilizer. We invest in vineyard weather and telemetry stations that have moisture probes. These work as a tool to guide



irrigation decisions to ensure we are only giving our vines the appropriate amount of water to keep them from over stressing in summer months and keeping our groundwater and electricity use to a minimum. All of these sources of nitrogen (compost, fertilizer and water) are taken into account when building our annual nitrogen budgets and we make sure not to exceed levels that would be used throughout the season.

Surface Water (Runoff of Sediment, Pesticides and Nutrients)

The main source of water runoff in our vineyards is storm water. There is very little that can be done to prevent this. Even in the most natural systems there is some sort of storm water runoff. We mitigate runoff by planting winter cover crops, seeding our avenues with barley, spreading straw, and using straw wattles where terrain is considered highly erodible. We have pest control advisors closely monitor all of our acres and they make recommendations on which pesticides to use only when necessary using an integrated pest management approach. Integrated pest management involves using various practices including cultural practices, increasing biodiversity and when chemical means are the only option left we use the ones with the lowest level of environmental impact whenever possible. We have a number of well-trained pesticide applicators that are closely supervised when making applications ensuring proper use of rates by calibrating application equipment and implementing all necessary safety practices. This helps us to maintain very low levels of pesticide residues in soils making leaching into groundwater supply and surface runoff a very low risk. Every pesticide application is reported to the appropriate county agricultural commissioner and is documented in our database.

SIP Certified

Many of our vineyard acres are Sustainable In Practice Certified. SIP Certified is a rigorous sustainable vineyard and winery certification with strict, non-negotiable requirements, committed to standards based on science and expert input, independent verification, transparency, and absence of conflict of interest. SIP requires and verifies implemented practices that protect water quality. If a grower does not implement or cannot document the standards and rules, they will not be certified. Eliminating duplicative reporting has been confirmed as a priority by the Regional Board staff and Board - recognizing SIP Certified leverages the annual reporting already required through certification. This creates a true incentive for growers and provides Regional Board staff with the information they need. SIP Certified welcomes the opportunity to work with Regional Board staff to develop a reporting program that is meaningful and meets statutory requirements of the new order. Vineyard Team generally supports phasing based on risk to water quality tied to farming practices, inputs, and proximity to impaired waterbodies. Vineyard Team supports numeric limits being applied to receiving water,



but disagree with numeric limits applied to edge of field monitoring due to a great amount of variability in field samples. Vineyard Team strongly disagrees with the proposal language in its prohibition of any discharge from a storm event. This is unreasonable and unachievable. Even in the most "natural" of landscapes, there is discharge. SIP are open and available to work with staff to develop appropriate nitrogen metrics for vineyards as a permanent crop, although vineyards could be exempted from nitrogen reporting based on an exemption criteria in East San Joaquin Order.

Thank you for taking the time to accept and read our grower comments/concerns.

Sincerely,

 President

VPS Management Team: including 3 PCAs, 7 QALs and an Accredited Farm Manager through ASFMRA.